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February 3, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No.10-252 and International File No. ITC-T/C-20101209-00480;  
Voicecom Telecommunications, Inc. and Amvensys Telecom Holdings, LLC - Joint  
Application for Approval to Transfer Control of Domestic and International Section  
214 Authorization (the "Application")

Dear Ms. Dortch:

In accordance with section 63.21(a) of the Commission's rules<sup>1</sup>, Voicecom Telecommunications, Inc. ("Voicecom") and Amvensys Capital Group, LLC (formerly known as Amvensys Telecom Holdings, LLC) ("Amvensys") (together, the "Applicants"), through the undersigned counsel, hereby file a corrected certification regarding their above-referenced Application, the basis for which is described more fully below.

It has recently come to Applicants' attention that the Application included two (2) errors upon which the Applicants based their previous certifications. Specifically, Applicants have identified the errors in their disclosures in the Application made pursuant to sections 63.18(d) and (h) of the Commission's rules.<sup>2</sup> Applicants regret any inconvenience such errors and the present corrections may cause the Commission.

First, in accordance with the requirement of section 63.18(d), Applicants provided the following statement as to whether the Applicants had previously received authority under Section 214 of the Act:

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<sup>1</sup> 47 C.F.R. § 63.21(a).

<sup>2</sup> 47 C.F.R. §§ 63.18(d) and (h).

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Transferor: Voicecom does not hold any domestic or international Section 214 authority. Voicecom Operating previously received authority from the Commission to provide resold international telecommunications services pursuant to File No. ITC-214-20020509-00226. Voicecom Operating also is authorized by the Commission to provide domestic interstate telecommunications services pursuant to a blanket license provided under Section 63.01(a) of the Commission's Rules.

Transferee: Amvensys does not nor do any Affiliates of Amvensys hold any domestic or international Section 214 authority.

Notably, Applicants' statements with respect to their own authority and with respect to the authorized entity actually subject to the transfer of control transaction described in the Application, Voicecom Telecommunications, LLC,<sup>3</sup> were correct and in compliance with section 63.18(d). However, at the time of disclosure, Amvensys' subsidiary, dPi Teleconnect, LLC, also held domestic section 214 authority and should have been disclosed in the statements above.

Because the extent of the Applicant's incorrect statement regarding section 214 authority only related to an affiliate of one of the Applicants that was not affected by the transfer of control transaction described in the Application, Applicants do not believe that the error in not identifying dPi Teleconnect was material. However, out of an abundance of caution, the Applicants are hereby updating the statements with respect to section 63.18(d) to reflect Applicants' authority under Section 214 of the Act at the time of the Application as follows:

Transferor: Voicecom does not hold any domestic or international Section 214 authority. Voicecom Operating previously received authority from the Commission to provide resold international telecommunications services pursuant to File No. ITC-214-20020509-00226. Voicecom Operating also is authorized by the Commission to provide domestic interstate telecommunications services pursuant to a blanket license provided under Section 63.01(a) of the Commission's Rules.

Transferee: Amvensys does not hold any domestic or international Section 214 authority. dPi Teleconnect, LLC, a subsidiary of Amvensys, is authorized by the Commission to provide domestic interstate telecommunications services pursuant to a blanket license provided under Section 63.01(a) of the

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<sup>3</sup> Voicecom Telecommunications, LLC is identified in the Application as Voicecom Operating.

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Commission's Rules. No other Affiliates of Amvensys hold any domestic or international Section 214 authority.

Second, with respect to section 63.18(h), Applicants disclosed that the following persons or entities own ten percent (10%) or more of the equity of Amvensys:

	Percentage		
Name/Address	Ownership	Citizenship	Principal Business
Z. Ed Lateef	100%	U.S.	Telecom

At the time of the disclosure, however, Mr. Lateef and his wife each held 50% of the membership interests of Amvensys, a manager managed limited liability company. Amvensys' company agreement and certificate of formation designated Mr. Lateef as the sole manager at the time of formation. Mrs. Lateef, on the other hand, was a non-manager, non-officer member and, except as authorized in the company minutes and/or resolutions, she was precluded from participating in the operation or management of, transacting any business for or in the name of, or signing for or binding Amvensys. Beyond her rights to share income, gain, distributions, losses and deductions, Mrs. Lateef could not affect any change to Amvensys by exercising her voting power without the concurrence of Mr. Lateef. Therefore, Mr. Lateef controlled Amvensys on a *de facto* basis. Although Applicants believe that their previous disclosure is not materially misleading, out of an abundance of caution, the Applicants hereby update the disclosure of the ownership of Amvensys to reflect such ownership at the time of the Application as follows:

	Percentage		
Name/Address	Ownership	Citizenship	Principal Business
Z. Ed Lateef	50% <sup>4</sup>	U.S.	Telecom
Lubna Lateef	50%	U.S.	Investments

Except as corrected through this filing, all other information in the above-referenced Application remains unchanged. Amvensys, the entity responsible for the original ownership disclosure and the original disclosure of its affiliates' section 214 authority, provides a new certification as attached hereto.

Should you have any questions regarding this supplemental filing, please do not hesitate to contact the undersigned at (770) 399-9500.

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<sup>4</sup> Mr. Lateef holds 50% of the membership interests of Amvensys and is its sole manager. Therefore, Mr. Lateef is attributed 100% control of Amvensys.

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Respectfully submitted,



Jon C. Martin  
Counsel for Voicecom Telecommunications, Inc.,  
Voicecom Telecommunications, LLC, and Amvensys  
Capital Group, LLC

JCM/jh

cc (VIA email):

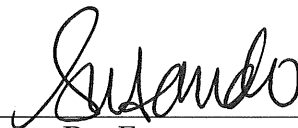
Daniel E. Mell, Voicecom Telecommunications, Inc.  
Susan Do, Esq., Amvensys Capital Group, LLC  
Charles A. Hudak, Esq.

## JOINT APPLICATION FOR TRANSFER OF CONTROL

### AMVENSYS CERTIFICATION

I, Susan Do, hereby certify under penalty of perjury that I am Associate Counsel of Amvensys Capital Group, LLC formerly known as Amvensys Telecom Holdings, LLC, the Transferee in the Application in WC Docket No.10-252 and International File No. ITC-T/C-20101209-00480, and that I am authorized to make this certification on behalf of Amvensys Capital Group, LLC. I hereby certify that:

- 1) the Transferee has not agreed to accept special concessions directly or indirectly from a foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future;
- 2) all statements made in the above-referenced Application and in the exhibits, attachments, or documents incorporated by reference pertaining to the Transferee, except to the extent modified by the attached letter, were true, complete, correct, and made in good faith at the time made; and
- 3) neither the Transferee nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance.



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Susan Do, Esq.  
Associate Counsel  
Amvensys Capital Group, LLC

Dated: February 3, 2012